

EXHIBIT

6

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF MISSOURI
3 ST. JOSEPH DIVISION
4 KAREN BACKUES KEIL,)
5)
6 Plaintiff,)
7)
8 vs.) Case No. 5:18-CV-06074-BP
9)
10 MHM SERVICES, INC.,)
11 et al.,)
12)
13 Defendants.)

14 IN THE UNITED STATES DISTRICT COURT
15 FOR THE WESTERN DISTRICT OF MISSOURI
16 ST. JOSEPH DIVISION
17 JANE DOE,)
18)
19 Plaintiff,)
20)
21 vs.) Case No. 19-06161-CV-SJ-BP
22)
23 MHM SERVICES, INC.,)
24 et al.,)
25)
26 Defendants.)

27 VIDEOCONFERENCE DEPOSITION OF TERI DEAN
28 Taken on behalf of the Defendants
29 April 23, 2021

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23 MHM SERVICES, INC.,)
24 et al.,)
25)
26 Defendants.)

27 VIDEOCONFERENCE DEPOSITION OF TERI DEAN, produced,
28 sworn, and examined on the 23rd day of April, 2021,
29 between the hours of eight o'clock in the forenoon
30 and six o'clock in the evening of that day, via
31 videoconference from Vandalia, Kansas, before ROBIN
32 PROUTY, RPR, a Certified Court Reporter within and
33 for the State of Missouri, in a certain cause now
34 pending in the United States District Court for the
35 Western District of Missouri, St. Joseph Division,
36 on behalf of the Defendants.

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12 INDEX OF EXHIBITS
13 EXHIBIT NO: MARKED: IDENTIFIED:
14 Exhibit 1 5 113
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17 (Original exhibits attached electronically to original
18 transcript.)
19
20
21
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23
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25

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<p style="text-align: right;">Page 17</p> <p>1 Q. How long were you on 6 House?</p> <p>2 A. I don't know. Maybe six months.</p> <p>3 Q. Then where did you go?</p> <p>4 A. I went to 7 House.</p> <p>5 Q. How long were you on 7 House?</p> <p>6 A. A few years maybe.</p> <p>7 Q. Then where did you go from there?</p> <p>8 A. 5 House.</p> <p>9 Q. How long were you on 5 House, do you</p> <p>10 recall?</p> <p>11 A. I did a few years on each house.</p> <p>12 Q. Then where did you go from 5 House then?</p> <p>13 A. 4 House.</p> <p>14 Q. Did you do a few years on 4 House?</p> <p>15 A. That's probably the least time I did, on</p> <p>16 4 House.</p> <p>17 Q. Okay. Then where did you go from there?</p> <p>18 A. At one point, I went back to 6 House.</p> <p>19 Q. Did you go somewhere after 6 House?</p> <p>20 A. I also went to 4 House when I did a</p> <p>21 treatment.</p> <p>22 Q. When was that?</p> <p>23 A. Maybe in 2013. I'm not --</p> <p>24 Q. Okay.</p> <p>25 A. -- exactly sure of the date.</p>	<p style="text-align: right;">Page 19</p> <p>1 A. Three or less violations per year.</p> <p>2 Q. Okay. We are here today because you filed</p> <p>3 a lawsuit against Edward Bearden, Elijah Mosier,</p> <p>4 Todd Mustain and Kevin Reed, as well as Director</p> <p>5 Anne Precythe, but alleging that the individuals</p> <p>6 sexually assaulted you; is that correct?</p> <p>7 A. Yes.</p> <p>8 Q. I guess -- well, I guess, first, when was</p> <p>9 the first time that you reported that Edward Bearden</p> <p>10 sexually assaulted you?</p> <p>11 A. In 2018.</p> <p>12 Q. And do you remember who you reported that</p> <p>13 to?</p> <p>14 A. Leslie Carsey.</p> <p>15 Q. Was that in July of 2018?</p> <p>16 A. I'm not sure. I don't remember the month.</p> <p>17 Q. Let me just try this because it will be a</p> <p>18 good test. I'm going to show you what I've</p> <p>19 marked -- or I'm going to attempt to show you what</p> <p>20 I've marked as Exhibit 3. Can you see a document on</p> <p>21 your screen that says Offender Statement?</p> <p>22 MS. SNOW: Can you zoom in on that,</p> <p>23 Nick? Yeah, that's better. Thank you.</p> <p>24 Q. (By Mr. Taulbee) Can you see that,</p> <p>25 Ms. Dean?</p>
<p style="text-align: right;">Page 18</p> <p>1 Q. Is that the only treatment you did while</p> <p>2 you were at DOC?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. That was like a 180-day treatment;</p> <p>5 is that right?</p> <p>6 A. Yes.</p> <p>7 Q. Any other housing units you lived on other</p> <p>8 than the ones you've told me about?</p> <p>9 A. No.</p> <p>10 Q. Okay. Did you request to move around to</p> <p>11 these housing units, or did you just get moved?</p> <p>12 A. I requested to move to 7 House. It was an</p> <p>13 honor dorm there.</p> <p>14 Q. Were you in the honor dorm the entire time</p> <p>15 you were in 7 House?</p> <p>16 A. No. I wasn't quite -- I was moved -- I was</p> <p>17 on C wing which wasn't an honor wing.</p> <p>18 Q. What does it mean to be in the honor dorm?</p> <p>19 A. You can go in and out of each other's</p> <p>20 rooms. You get to go eat first. You get more good</p> <p>21 visits. You get to stay up later at night.</p> <p>22 Q. What do you have to do to get placed in the</p> <p>23 honor dorm?</p> <p>24 A. You have to be three or less violations.</p> <p>25 Q. Say that again?</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Yes.</p> <p>2 Q. And do you recognize this?</p> <p>3 A. Yes.</p> <p>4 Q. And this is -- well, this is your</p> <p>5 handwriting in the body of this statement; is that</p> <p>6 right?</p> <p>7 A. Yes.</p> <p>8 Q. And this is dated July 20th, 2018 in the</p> <p>9 right-hand corner there; is that right?</p> <p>10 A. Yes.</p> <p>11 Q. Did you give this written statement as a</p> <p>12 part of a -- a verbal interview or an oral interview</p> <p>13 that you also gave to Ms. Carsey?</p> <p>14 A. Yes.</p> <p>15 Q. And these are your words. You wrote these.</p> <p>16 Ms. Carsey didn't dictate them to you or anything</p> <p>17 like that?</p> <p>18 A. That's correct.</p> <p>19 Q. Was when you gave that written statement</p> <p>20 accompanied by your interview the first time you had</p> <p>21 reported to DOC allegations against Mr. Bearden?</p> <p>22 A. Yes.</p> <p>23 Q. For Elijah Mosier, when was the first time</p> <p>24 you reported the allegations that he had sexually</p> <p>25 abused you or assaulted you?</p>

<p style="text-align: right;">Page 177</p> <p>1 rub himself inappropriately against plaintiff's 2 body. Where in the kitchen did he inappropriately 3 rub against you? 4 A. In the utility closet. 5 Q. Besides the utility closet, did he rub 6 himself against you anywhere else? 7 A. He would brush up against me, yes. 8 Q. What does it mean by "brush up against 9 you"? 10 A. He would get close as he could and rub up 11 against me and then keep going. 12 Q. When you say he rubbed up against you, is 13 it at your hip? Is it from the back or the front? 14 A. From the behind. 15 Q. So when he rubbed up against you from the 16 behind, that is when other people are in the kitchen 17 or is that when no one else is in the kitchen? 18 A. There were other people in the kitchen. 19 Q. How many other people would be in the 20 kitchen? 21 A. I can't tell you that. 22 Q. Okay. You mentioned when you had count 23 that there were 20 people accounted for in the 24 count. Were all 20 people working in the kitchen in 25 that 4 to 10 a.m. shift?</p>	<p style="text-align: right;">Page 179</p> <p>1 further questions. 2 EXAMINATION 3 BY MS. SNOW: 4 Q. All right. I just have a little follow-up, 5 Teri. Are you good to keep going? 6 A. Yeah. 7 Q. It should not be long. I'm just going to 8 clarify a few things for me. First off, tell me 9 what an IRR form is. 10 A. It's an informal – informal resolution 11 request. 12 Q. And what is your understanding the purpose 13 of that form? What's the purpose of that form? 14 What have you been told the purpose of that form is? 15 A. It's to bring them to violation. 16 Q. Can you elaborate on that for me? 17 A. If you get a violation and you dispute it, 18 you get an IRR. 19 Q. Okay. Have you ever been told that if 20 you're assaulted, you should fill out an IRR form? 21 A. No. 22 Q. Have you ever been told – strike that. 23 Have you attempted to fill out IRR forms relating to 24 the allegations in this case? 25 A. Now?</p>
<p style="text-align: right;">Page 178</p> <p>1 A. Yes. 2 Q. When Mr. Reed grabbed your breast over your 3 clothing, where did he do that? 4 A. In the utility closet. 5 Q. Did he ever grab your breasts in the 6 kitchen? 7 A. I don't remember. 8 Q. So just to clarify, he would rub himself 9 inappropriately against you in the kitchen and the 10 utility closet. Is there anywhere else he would 11 inappropriately rub against you besides those two 12 places? 13 A. No. 14 Q. And then for grabbing your breasts over 15 your clothing, did he grab your breasts anywhere 16 else besides the utility closet and maybe the 17 kitchen? 18 A. No. 19 Q. And approximately how many times do you 20 think he inappropriately rubbed himself against you? 21 MS. SNOW: I'm going to object to the 22 extent this has been asked and answered now numerous 23 times. But go ahead. 24 A. I'm not sure how many times. 25 MS. WANG: Thank you. I have no</p>	<p style="text-align: right;">Page 180</p> <p>1 Q. Yes. 2 A. Yes. 3 Q. And – and who did you talk to about 4 filling out those forms? 5 A. Ms. Hobbs and Mr. Winterbower. 6 Q. And what did Ms. Hobbs tell you? 7 A. That it had to be 15 days within the 8 incident. 9 Q. And what did Mr. Winterbower tell you? 10 A. The same. 11 Q. So to date, as you sit in this chair next 12 to me, have you been able to fill out an IRR? 13 A. No. 14 Q. You started talking – when Zach asked you 15 about kind of the difference between Vandalla and 16 Chillicothe, you kind of started going down a list 17 of things that are different. And I believe you 18 said you could have private visits at Chillicothe 19 with your son, the food was better, you had more 20 food visits up there. What else did you have at 21 Chillicothe that you do not have here? 22 A. I had all the friends that I had from just 23 coming into prison. I've been living with these 24 women for eight years. 25 Q. Were you given the ability to just go</p>

45 (Pages 177 to 180)